

**SULLIVAN & CROMWELL LLP**

125 Broad Street

New York, New York 10004

Telephone: (212) 558-4000

Facsimile: (212) 558-3588

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL  
SERVICES (LUXEMBOURG) S.A. (f/k/a  
AMERICAN EXPRESS FINANCIAL  
SERVICES (LUXEMBOURG) S.A. and f/k/a  
AMERICAN EXPRESS BANK

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01565 (CGM)

(LUXEMBOURG) S.A.), as represented by its  
Liquidator HANSPETER KRÄMER,  
HANSPETER KRÄMER, in his capacities as  
liquidator and representative of STANDARD  
CHARTERED FINANCIAL SERVICES  
(LUXEMBOURG) S.A., STANDARD  
CHARTERED BANK INTERNATIONAL  
(AMERICAS) LTD., f/k/a AMERICAN  
EXPRESS BANK INTERNATIONAL, and  
STANDARD CHARTERED HOLDINGS INC.  
(as successor in interest to STANDARD  
CHARTERED INTERNATIONAL (USA)  
LTD., f/k/a AMERICAN EXPRESS BANK  
LTD.),

Defendants.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2022, the **Reply Memorandum of Law in Further Support of the Standard Chartered Defendants' Motion to Dismiss** (ECF No. 22441) was served by filing it with the Court's Electronic Case Filing System. Notice of this filing has been sent through the Court's Electronic Case Filing System and via electronic transmission to the email addresses designated for delivery.

Dated: October 17, 2022  
New York, New York

Respectfully Submitted,

/s/ Andrew J. Finn

Andrew J. Finn

Mark A. Makar

SULLIVAN & CROMWELL LLP

125 Broad Street

New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
Email: finna@sullcrom.com  
Email: makarm@sullcrom.com

Diane L. McGimsey (*pro hac vice*)  
1888 Century Park East  
Los Angeles, California 90067  
Telephone: (310) 712-6600  
Facsimile: (310) 712-8800  
Email: mcgimseyd@sullcrom.com

*Attorneys for Standard Chartered  
Defendants*